

REMARKS/ARGUMENTS

Claims 1-12 are pending in the present application and stand rejected.

Claims 11-12 are rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Claims 6 and 10 are rejected under 35 U.S.C. §112 as lacking proper antecedent bases for specific limitations.

Claims 1, 3-7, 9, and 11-12 are rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication US 2004/0043758 to Sorvari et al. (hereinafter "Sorvari").

Claims 2, 8, and 10 are rejected under 35 U.S.C. §103(a) as unpatentable over Sorvari in view of United States Patent Application Publication US 2003/0163567 to McMorris et al. (hereinafter "McMorris").

Claims 1, 11, and 12 are amended. Claims 2 and 8 are canceled without prejudice or disclaimer. New claims 13-16 are added. Support for the new and amended claims can be found throughout the application and, among other places, in particular with reference to Figures 2, 3, and 7-8. No new matter has been added.

Rejections under Section 101

A. Claim 11

Claim 11 recites a *service providing system* employing a plurality of devices and a server. The *server manages the devices* to carry out services in coordination with one another. Among its features, the inventive *system* includes "a unit which prompts the user to select a service from a provided service menu... a unit which generates a group encryption key that is common to the devices that carry out the service in coordination... a unit which generates adaptors that contain the extracted service components... a unit which receives the adaptor from the server and carries out the service according to information in the adaptor."

Applicants respectfully submit that the claimed system, including server and managed devices, is not merely software as suggested in the Office Action. See, Office Action

at ¶2. Notwithstanding that some functionality may be provided through software, the system contains specific hardware components for producing a useful, concrete, and tangible result. For example, as claimed, the device used by the user prompts the user for input from a service menu. Thereafter, operations are performed that result in the server generating and delivering an adaptor to the devices which carry out the selected service. These limitations are clearly directed at tangible things that produce concrete results. Accordingly, withdrawal of the rejection under 35 U.S.C. §101 is respectfully requested.

B. Claim 12

Claim 12 is amended to recite "a processing program embodied in a computer readable medium" as suggested by the Examiner. Accordingly, Applicants submit that claim 12 now provides the appropriate structural and functional relationships to support its use as a computer component.

Rejections under Section 112

Claim 1 is amended to recite "generating a group encryption key..." and therefore provides a sufficient antecedent basis for "the group encryption key" recited in claim 6. Similarly, claim 1 also provides a sufficient antecedent basis for "the group encryption key" recited in claim 10. Applicants therefore respectfully request withdrawal of the rejections under 35 U.S.C. §112.

Rejections under Section 102

A. Claim 1

Claim 1 recites a service executing method employing a plurality of devices and a server. The user selects a service and the system operates to provide the service by coordinating devices in the plurality of devices according to a service logic. The method further includes usage rights, a group encryption key, and adaptors. As discussed below, Applicants respectfully submit that the Sorvari reference fails to disclose at least these features.

Sorvari discusses a system in which a wireless device accesses services over a network. The wireless device communicates with a gateway to access URLs at various remote

data servers. See, Sorvari at [0050]. To make it easier and more convenient to operate, the wireless device includes various bookmarks and bookmark management features. See e.g., Sorvari at [0010].

As an initial matter, Applicants note that Sorvari's gateway does not manage a plurality of devices to carry out services in coordination with one another. Instead, as best understood, the gateway simply functions as a proxy server permitting the wireless device to access the remote data servers through their respective URLs. See, Sorvari at [0050]. The gateway apparently makes the process more convenient by storing preference data, making recommendations, etc. However, these functions do not constitute management of the remote servers by the gateway nor is there any suggestion that the remote servers provides services in coordination with one another under the gateway's management. Thus, Sorvari does not disclose "a server which manages the devices to permit the plurality of devices to carry out services in coordination with one another."

In addition, Sorvari does not disclose acquiring the right to use selected functions at the coordinated devices. Here, the office action mentions Sorvari's use of wireless PKI for authentication. See, Office Action at p.4, ¶8. However, as known in the art, authentication does not prevent another user from accessing a particular server. It is therefore different from acquiring usage rights as claimed. Moreover, Sorvari indicates that authentication applies to transactions between one user and one server. See, Sorvari at [0339]. There is no disclosure that devices are selected and that usage rights are acquired for various functions at the selected devices. Accordingly, Sorvari fails to disclose "acquiring the right to use the selected functions, wherein the right to use a function prevents a user from using the function when another user is registered to use the same function."

Because Sorvari fails to disclose managing devices to carry out services in coordination with one another, this reference similarly fails to disclose generating group encryption keys common to the coordinated devices. Applicants note that, in the rejection of claim 2, the office action suggests that the claimed group encryption keys are disclosed by McMorris at [0003]. However, this paragraph simply describes SSL-based communications and observes that such secure communication may thwart "man-in-the-middle" attacks. It does not

disclose generating group encryption keys used in the context of devices carrying out services in coordination with one another. Therefore, neither reference discloses "generating a group encryption key that is common to the devices that carry out the service in coordination with one another and that is used for encrypting data transmitted or received among the plurality of devices when the devices carry out the service in coordination with one another."

Finally, Applicants respectfully submit that there is no disclosure of the claimed adaptors. Specifically, the office action cites Sorvari's translation between HTML and WML as teaching the step of generating adaptors. See, Office Action at p.4, ¶8. However, Sorvari's data format translation clearly does not contemplate inclusion of a group encryption key in the translated data. Accordingly, Sorvari fails to disclose "generating adaptors that contain the extracted service components, a service identifier, and the group encryption key" as claimed.

B. Claims 11-12

Claim 11-12 each recite limitations similar to those discussed above and each is therefore believed allowable over Sorvari for at least the reasons previously given. Reconsideration and allowance of claims 11-12 is respectfully requested.

C. Claims 3, 4, 5, 6, 7, 9

Claims 3-7 and 9 depend from claim 1 and each therefore incorporates all of the limitations previously discussed. Accordingly, dependent claims 3-7 and 9 are allowable over Sorvari for at least the reason that they depend from an allowable base claim.

Rejections under Section 103

Claims 2, 8, and 10 were rejected as unpatentable over Solvari in view of McMorris. Claim 2 and claim 8 are canceled. As such, these rejections are moot. Claim 10 depends from claim 1. Applicants submit that McMorris fails to supply the limitations missing from Sorvari as discussed above. Therefore, the combination of references fails to disclose each and every claim element and thus does not render the claimed invention obvious. Reconsideration and allowance of claim 10 is respectfully requested.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 858-350-6100.

Respectfully submitted,



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